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**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

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11 ZHU, LIAN KUN,) CIVIL CASE NO. 08-0012
12 Petitioner,) CRIMINAL CASE NO. 03-00018
13 v.)
14) DECLARATION OF ZHU
15 UNITED STATES OF AMERICA,) LIAN KUN IN SUPPORT OF
16) PETITION TO VACATE, SET
17 Respondent.) ASIDE, OR CORRECT
) SENTENCE
) PURSUANT TO 28 U.S.C.
) § 2255

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20 COMES NOW, ZHU, LIAN KUN, and states the following:

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1 necessary.

2 3. During the course of my trial in Criminal Case 03-00018 a person by the name of
3 Zhu, Han Liang reported to me that he observed the prosecutor making hand signals to two of the
4 witnesses in my trial.

5 4. Although Mr. Zhu, Han Liang has the same last name as me, we are not related.

6 5. I am informed and believe that Mr. Zhu, Huang Lian is no longer on Saipan and has
7 returned to China.

8 6. The only contact information which I have for Mr. Zhu, Han Liang is his cell phone
9 number in China. That number is 011 136-519-77175.

10 7. Mr. Zhu, Han Liang reported to me and my former attorney that the two witnesses
11 who were being signaled by the prosecutor during my trial were Agent Ray M. Rengual and Jiang,
12 Li Xia.

13 8. This information was reported to my attorney Mr. F. Mathew Smith by Mr. Zhu,
14 Han Liang, in my presence during a recess in the trial.

15 9. Mr. F. Mathew Smith informed me that he discussed this matter with the prosecutor
16 but that the prosecutor denied making any such signals.

17 10. Mr. F. Mathew Smith never informed the judge about these incidents of signaling
18 between the prosecutor and these witnesses.

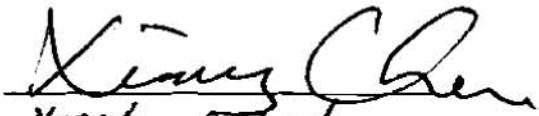
19 I declare under penalty of perjury under the laws of the United States that the foregoing is

1 true and correct and that this declaration was executed in the Moshanon Federal Detention Facility,
2 in the State of Pennsylvania on this 15 day of April, 2008.

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4 ZHU, LIAN KUN, Declarant
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7 CERTIFICATE OF TRANSLATION
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9 I, XIANG CHEN, hereby certify that I am competent to translate from
10 English to Chinese and vice versa. I have translated the contents of the above declaration
11 from English to Chinese and Mr. Zhu, Lian Kun told me that he understood the statements
12 made in the Declaration before he signed this document.

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14 Date: April 15 /08
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XIANG CHEN
(Signature and printed name of translator)